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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

10 CORI MUSTIN, as Guardian for HERMAN  
E. FANDEL, and the ESTATE OF IRENE E.  
FANDEL,

Case No.: 2:15-cv-01430-JCM-PAL

**Plaintiffs,**

vs.

13 RALPH A. FANDEL, an individual;  
14 INTERNAL REVENUE SERVICE;  
15 UNIVERSITY MEDICAL CENTER, a  
division or department of a political  
16 subdivision of the State or Nevada and  
DOES I through X, inclusive.

#### Defendants.

**STIPULATION AND ORDER TO CONTINUE DEADLINES**  
**(SECOND REQUEST)**

20       **IT IS HEREBY STIPULATED AND AGREED** by and between the parties and their  
21 respective counsel of record, that the Defendants, RALPH A. FANDEL and INTERNAL  
22 REVENUE SERVICE, shall have through and including August 26, 2016 (an additional 74 days  
23 from the current date) to file a responsive pleading to Plaintiff's Motion for Summary Judgment,  
24 filed on April 20, 2016. This continuance is requested to allow the time necessary for the Order  
25 to be entered in Alaska Probate Court, which will in turn resolve this litigation.

26       **IT IS FURTHER STIPULATED AND AGREED** by and between the parties and their  
27 respective counsel of record, that Plaintiffs and RALPH A. FANDEL shall have through and  
28 including August 26, 2016 (an additional 74 days from the pending dates) to file a responsive

1 pleading to Defendant, INTERNAL REVENUE SERVICE'S Motion for Summary Judgment,  
2 filed on April 18, 2016. The failure to file a responsive pleading was based on the belief that the  
3 action was resolved on or before the dispositive motion deadline.

4 **IT IS FURTHER STIPULATED AND AGREED** by and between the parties and their  
5 respective counsel of record, that the parties shall have through and including August 26, 2016  
6 (an additional 74 days from the current pending date) to file a Joint Pretrial Order.

7 This is the second stipulation for an extension of time to file oppositions to Motions for  
8 Summary Judgment and to file a Joint Pretrial Order.

9 THE BALL LAW GROUP

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10 By: /s/ Zachary T. Ball

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15 U.S. DEPARTMENT OF JUSTICE

16 By: /s/ Gerald A. Role

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22 **IT IS SO ORDERED.**

23 DATED June 22, 2016.

25   
UNITED STATES DISTRICT JUDGE